



December 28, 2017

Rio Grande National Forest
Attn: Rio Grande Forest Plan Revision
1803 W. Highway 160
Monte Vista, CO 81144

Dear Rio Grande National Forest (RGNF):

On behalf of the Wild Sheep Foundation (WSF), please accept this comment letter on the RGNF Forest Plan Revision (FPR). WSF and our Colorado affiliate the Rocky Mountain Bighorn Society (RMBS) have been engaged on the RGNF FPR over the past couple years, and we submit these comments on the Draft Revised Land Management Plan (dated September 2017). For reasons we will detail, WSF's specific request and recommendation to USFS R2 is to include and analyze bighorn sheep (BHS) on the RGNF as a Species of Conservation Concern (SCC), as defined under the 2012 Forest Planning Rule.

The focus of the 2012 Forest Planning Rule is to maintain or restore ecological integrity, ensuring USFS management provides conditions necessary to support plant and animal diversity. According to USFS Handbook 1909.12, ecological conditions include habitat and other ecological and human-influences (i.e., human-usage) on species and the environment (e.g., livestock grazing). Stressors are factors that may directly or indirectly degrade or impair ecosystem composition, structure or ecological processes in a manner that may impair ecological integrity. It has been well established in the scientific literature that bacteria transmitted from domestic sheep results in pneumonia-related all-age die-offs within BHS populations, followed by long-term suppressed lamb recruitment; these events are not uncommon. The ongoing presence of domestic sheep on and adjacent to BHS habitat is a stressor that impairs NFS lands from providing the ecological conditions BHS require. Coarse-filter habitat plan components alone will not provide sufficient conditions required by the 2012 Rule for BHS persistence. Based on strong scientific evidence, WSF (and others) are substantially concerned over long-term persistence of BHS on the RGNF.

Our focus is on Rocky Mountain BHS, the outcomes and recommendations from the 2007 Beecham et al. USFS R2 BHS Technical Conservation Assessment, BHS's existing designation by USFS R2 as a "Sensitive Species", the recurring acknowledgement in early FPR documents/assessments that BHS would and should be addressed as an SCC species in the RGNF FPR, and bewilderment that sometime between September 2016 and September 2017, BHS were excluded from the RGNF SCC list, without publicly-accessible, written rationale or public input.

BHS are currently on the Regional Forester's Sensitive Species (SS) list as well as Colorado Parks and Wildlife's (CPW) list of Species of Greatest Conservation Need (SGCN). The facts and best available science that supported those SS and SGCN designations have not changed. In RGNF Assessment 5 for At-Risk Species, on page 2 of the Executive Summary, under the heading "What We Heard", under Important Species, it is stated *"...the public also stressed the importance of considering species of conservation concern during our forest plan revision process. A variety of flora and fauna on the forest are considered important species, including BHS"*. Continuing, on page 3 of the Appendix 5 Executive Summary, it is further stated *"...elk and bighorn sheep are not as common as before...Chakita Peak has seen a decline in bighorn sheep habitat..."* Page 4 of this Executive Summary, under Identifying At-risk Species continues *"...in our forest planning process, we will identify federally-listed species as well as species of conservation concern. The species we identify will be based*

*on our assessment, and public input. **The forest supervisor will recommend a list of species of conservation concern known to exist on the forest to the regional forester for approval.** We are already in the process of analyzing and identifying species of conservation concern. The region has developed a model to help us identify which species should be included on the list for the Rio Grande National Forest. Because of the complexity of data analysis, we do not currently have a list for the public. **Once our list of species is complete, we will release it to the public.** [emphasis added]*

Assessment 5 for At-risk Species details the ~9-step process used to develop and refine the list of species, including (page 4.1.b.) “Potential Species of Conservation Concern”. The existing Regional Forester’s Sensitive Species list (RFSS) provided the initial starting point, and the list of SS was distilled down to N=118 species (page 31) that were considered in-depth for “At-Risk” status on the RGNF; N=106 species (including BHS) were considered for SCC status. Numerous steps and “filters” were further utilized, including c) Species identified by Federal, State, federally recognized tribes, or Alaska Native Corporations as a high priority for conservation. **[Footnote: as mentioned above, under their Statewide Wildlife Action Plan (SWAP), Colorado Parks & Wildlife (CPW) has included BHS as a Species of Greatest Conservation Need (SGCN), reinforcing the need for the USFS RGNF to include BHS as an SCC species].**

Supporting documentation found in RGNF Assessment 5, the 2007 Rocky Mountain BHS Technical Conservation Assessment, the 2010 RGNF Final Supplement to the Forest Plan Biological Evaluation and Conservation Assessment for Rocky Mountain BHS, and CPW’s 2014-2016 Colorado BHS population estimate data appear to be the best available science, upon which the Draft EIS and Draft Forest Plan Revision should have been developed. Information in these documents supports substantial concern for BHS persistence, yet in subsequent USFS documents (see below), BHS as a species were excluded from SCC designation. It is clear that the conclusion reached was not based upon the facts found in the RGNF’s own documentation of best available science. The following are specifics from the above referenced documents that demonstrate substantial concern for BHS persistence that was apparently not taken into account in SCC determination.

RGNF Assessment 5 and 2014-16 CPW post-hunt population estimates: This document correctly points out that best available science is required to make SCC determinations. Information in associated USFS documents provides significant evidence for substantial concern for BHS persistence on the RGNF planning unit.

- There are significant threats caused by stressors ON and OFF the RGNF that affect BHS populations. The presence of domestic sheep impedes the ecological conditions necessary for long-term persistence;
- Declining trends: 3 of 7 BHS DAUs show declining population trends, with trajectories indicating that these BHS populations will likely disappear;
 - 2016 data: DAU 11 Trickle Mountain with 35 animals, DAU 24 South San Juans with 30 head in Alamosa Canyon and 60 head in Conejos Canyon; DAU 26 Natural Arch/Carnero Creek with 15 animals;
 - GMU S15 is shown as secure with no grazing on the RGNF, but it is part of the Weminuche DAU 20 that does have grazing in very close proximity (on the San Juan NF), and is indeed, at-risk. CPW’s herd management plan lists disease from interaction with livestock as a primary concern for this herd:
<http://cpw.state.co.us/Documents/Hunting/BigGame/DAU/BighornSheep/RBS20DAUPlan.pdf>
 - Weminuche landscape grazing analysis risk assessment that identifies current domestic sheep grazing on the San Juan NF as threatening long-term viability of the Weminuche BHS herd:
http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/83582_FSPLT3_2718886.pdf;

- DAU 21: Says “secure but vulnerable”. In our read, being vulnerable does not equal a herd being secure. Allotments on the neighboring BLM Tres Rios and Gunnison Field Offices and GMUG NF overlap CPW mapped occupied range for this DAU. Three bighorn sheep were euthanized by CPW in 2016 when they came into contact with domestic sheep on one of the Tres Rios allotments. This DAU includes GMUs S21 and S33; these GMUs were closed to hunting in the 1990’s after an all-age die-off reduced the S21 portion to an estimated 40 animals, and reduced the S33 portion to 20-25 animals. [See the CPW herd management plan for reference and risk of disease, including the fact that the CPW population objective for the herd is lower than it would otherwise be, due to the risk of contact with domestic sheep on federal grazing allotments]:
- http://cpw.state.co.us/Documents/Hunting/BigGame/DAU/BighornSheep/RBS21DAUplan_SanJuanWest.pdf;
- DAU 22: Includes 4 GMUs including S36 that CPW says is diseased and has shown marginal recovery, going from 50 to 80 animals between 2014 and 2016. GMU S53 is noted as diseased with potential recovery, as well; it went from 115 down to 80 in the 2014-2016 time frame, not recovering but declining. S22 has gone from 60 to 80, showing minimal growth. S52 is estimated at 20 animals, and may not contain any surviving ewes. [See CPW’s herd management plan, which lists the potential for contact with domestic sheep and subsequent disease as the primary management concern for this herd]:
- <http://cpw.state.co.us/Documents/Hunting/BigGame/DAU/BighornSheep/RBS22ManagementPlanFinal.pdf>;
- Table 3 indicates there is uncertainty regarding BHS capability to persist due to anthropogenic stressors, with substantial concern across multiple land ownerships. Only 3 of 4 BHS “herds”, which in reality are sub-herds, might be considered secure;
- Table 4 lists a number of risk factors including disease; and
- It appeared BHS would be included on the RGNF SCC list, but, that designation is not carried forward in the RGNF FPR.

2010 RGNF Final Supplement to the Forest Plan Biological Evaluation and Conservation Assessment for Rocky Mountain Bighorn Sheep and 2007 Rocky Mountain Bighorn Sheep Technical Conservation Assessment:

- Most BHS GMU population sizes are less than 100 animals, and lack of connectivity result in BHS being vulnerable to extirpation;
- Although connectivity is desirable from a historic meta-population standpoint, disease issues make connectivity and restoration of meta-population structure and function problematic;
- BHS were nearly extirpated on the RGNF; most sub-populations are the result of transplants. The rationale of not providing for BHS because they have been transplanted is counter-intuitive to restoration and recovery;
- The minimum number required for “viability” varies in the literature from 125-250; the majority of BHS herds on the RGNF are well below those thresholds of minimum population size;
- Persistence is unlikely in GMUs 10, 29, and 55; questionable for GMU 36; possible for GMU 22; probable for GMUs 30, 33, 53, and likely for GMUs 8, 9, 15 on the RGNF;
- All but 4 (8, 9, 10, 55) of the 11 GMU’s contain overlap with domestic sheep grazing allotments, but both GMUs 10 and 55 have exposure to domestic sheep on adjacent BLM, State and private land. Only GMUs 8,

9, and 15 might be considered secure on the RGNF [See 2 bullets below about S-15 not actually being secure];

- The analysis of BHS security on the RGNF is faulty; BHS movements across administrative boundaries that could result in contact with domestic sheep do not appear to have been considered. “Several BHS herds continue to be exposed to potential contact with domestic sheep on other public land ownerships in southwest and southcentral Colorado.” Herd interactions occur frequently between adjacent NF and BLM lands with inconsistent analysis methods to conduct risk of contact evaluations. For example, GMU S-15 was given a “secure” designation regardless of it being impacted by domestic sheep grazing on the adjacent San Juan NF;
- “Of the BHS herds considered at high risk of extirpation in the USFS R2 BHS Assessment, approximately ½ were herds in the San Luis Valley Public Land Center.” Although this administrative combination isn’t being used today, it is the area the RGNF Plan Revision addresses. The land ownership and resource management decisions affecting BHS are still in place;
- USFS RGNF analysis indicated that the risk of contact in these areas could potentially influence healthy BHS on adjacent National Forests because of their movements/interactions across administrative boundaries. BHS are further challenged by domestic sheep on state and private lands not within the control of the RGNF; and
- USFS RGNF analysis indicated there is potential for contact on 8 of the 11 BHS GMUs on the RGNF.

In September 2016, during the initial scoping period, in the RGNF “Need for Change” summary, the RGNF acknowledged the need to:

Update direction to further promote the recovery and conservation of federally recognized threatened, endangered, proposed, and candidate species;

and on Page 62707:

“Revised plan components are needed that focus on maintaining or restoring aquatic and terrestrial ecosystems to provide for species diversity including threatened and endangered species, and species of conservation concern.”

In Table 2 (page 32), Species **Not** [emphasis, underlining added] Carried Forward for Analysis as Species of Conservation Concern on the RGNF, N=37 species were not carried forward; **BHS were NOT identified in Table 2 as NOT being carried forward, so WSF (and others) continued to believe that BHS would be further analyzed for SCC consideration.** Under Table 3, RGNF DRAFT SCC, BHS were specifically included (page 40) with rationale as to why BHS were to be included on the SCC list. Furthermore, (page 59), Conditions and Features Needed by BHS were again identified, and (N=5) Risk Factors for this species were specifically listed. Our point, nowhere in Assessment 5 for At-risk Species were BHS specifically identified as other than a SCC-considered species.

Forwarding to the August 17, 2016 1920 memo to RGNF Forest Supervisor Dan Dallas of the List of Species of Conservation Concern for the Rio Grande National Forest, signed by James Bedwell (for Acting Regional Forester Jacque Buchanan), on page 1 of the August 8, 2016 At-risk Species Process for Forest List Development and Regional Forester Approval, Rocky Mountain Region, it is clearly stated that “...***the potential list of SCC will not be finalized for 2012 Rule Revision Forests until the Record of Decision (ROD) is signed for the revised plan at the end of the revision process. While the Forest Supervisor is the Responsible Official for the overall Plan revision or amendment, the Regional Forester is the Responsible Official for the list of SCC for each Forest.***” [emphasis added]

Continuing on page 2 of this August 8, 2016 direction, “...*documenting the process of developing species lists including rationale for including and excluding species from these lists is very important.*” [emphasis added]. Under Species of Conservation Concern, it further states “...*public involvement during the assessment phase of plan development, revision or amendment, should include the opportunity for the public to provide input to the proposed SCC list.*” SCC are defined as:

- a) A native species (which BHS are);
- b) Known to occur in the planning area (which BHS do); and
- c) Substantial concern [exists] for persistence in the planning area [which was noted in Assessment 5]

“...*a species must be identified as an SCC if ‘the best available scientific information indicates substantial concern about the species’ capability to persist over the long-term in the plan area*”. It is WSF’s contention that the 2007 Beecham et al. Technical Conservation Assessment for BHS for USFS R2 and the 2010 RGNF BHS Assessment are/were the best scientific information available, and should have heightened the need for the USFS RGNF to include BHS as an SCC species.

Continuing on pages 3-4 of this August 8, 2016 RO direction:

b) Species that *should* be considered:

3. Species identified on other relevant Federal, State, federally recognized Tribes, or Alaska Native Corporations lists as being high priority for conservation [see footnote above, where CPW has included BHS as a SGCN in their SWAP]

Deliberative Process Leading to Regional Forester Approval of SCC:

2. The current Regional Forester’s Sensitive Species list (RFSS) is based on the same general selection criteria as SCC, and should be the starting point for an initial SCC list. Public involvement will also be important to refining the initial proposed list. **WSF (and others) question where public involvement has occurred, in the RGNF’s decision to exclude BHS from their SCC list.** [emphasis added]

In our opinion, BHS clearly meet the criteria for SCC designation. The rationale for non-selection found on page 527 of the Draft EIS is inaccurate and inadequate. The RGNF is justifying dismissal of BHS as a SCC on the size of one herd, the Sangre de Cristo DAU, assuming that CPW will manage hunting pressure and will provide for augmentation, if needed. There are several flaws in this logic. Management of hunting pressure will not restore the ecological conditions required for BHS persistence. Periodic augmentation will also not restore ecological conditions, and CPW is rarely doing augmentations because of concerns about novel pathogen transfer/movement.

Page 168 of the draft FP begins Appendix D: “SCC Presence and Concern for Persistence”, Table 21 lists Current SCCs, and Table 22 (beginning page 180) lists “Species Considered Early but After Further Review Were Not Identified as SCC”. Under the Mammals heading on page 183, BHS includes “Rationale for Not Including the Species as Draft SCC”; this appears to be the only written rationale available to support the USFS RGNF decision to exclude BHS from their SCC list and occurred sometime after the September 2016 SCC list was circulated. This brief rationale does not do justice to the complexity of BHS management on the RGNF, nor does this fully explain or characterize the precarious state of BHS on the RGNF.

The real issue is that the impact of domestic sheep grazing on ecological conditions threatening BHS persistence is not openly addressed. The majority of BHS populations on the RGNF are small. One herd, DAU 10, Sangre de Cristo, is over 300 animals according to CPW (360 in 2016, but the end of calendar year 2017 population estimate will be revised down, to 330 animals). The Trickle Mountain herd (DAU 11) used to be one of the most productive in the state of Colorado, with an estimated 500 animals. A die-off occurred in 1993-94 that reduced that herd’s size to around 50; the Trickle Mountain herd is now estimated at 35 animals. Clearly, depending on one herd to provide long-term persistence and viability is not appropriate. The USFS RGNF’s

own documents point out the vulnerability of most BHS on the RGNF. The rationale for non-selection of BHS as an SCC is inadequate and inaccurate, as the conclusions drawn are not consistent with the facts found. Substantial concern for BHS persistence and long-term viability is clearly documented. The facts and best available science support the need to designate BHS as an SCC on the RGNF. Failure to do so is contrary to the 2012 Planning Rule and USFS implementation guidance (FSM 1920 and FSH 1909.12). Not listing BHS as SCC puts them into the coarse-filter group of species, with the errant assumption that managing for adequate habitat will be sufficient to provide for long-term persistence.

Species of Conservation Concern for Rio Grande National Forest

Common Name	Latin Name
Animals	
Boreal toad	<i>Anaxyrus boreas</i>
Western bumblebee	<i>Bombus occidentalis</i>
White-veined arctic butterfly	<i>Oeneis bore</i>
Rio Grande chub	<i>Gila pandora</i>
Rio Grande cut-throat trout	<i>Oncorhynchus clarkia virginalis</i>
Rio Grande sucker	<i>Catostomus plebeus</i>
Bald Eagle	<i>Haliaeetus leucocephalus</i>
Boreal Owl	<i>Aegolius funerus</i>
Brewer's Sparrow	<i>Spizella breweri</i>
Flammulated Owl	<i>Otus flammeolus</i>
Golden Eagle	<i>Aquila chrysaetos</i>
Northern Goshawk	<i>Accipiter gentilis</i>
Olive-sided flycatcher	<i>Contopus cooperi</i>
Peregrine falcon	<i>Falco peregrinus anatum</i>
Southern White-tailed ptarmigan	<i>Lagopus leucurus alpinus</i>
American martin	<i>Martes americana</i>
Fringed myotis	<i>Myotis thysanodes</i>
Gunnison's prairie dog	<i>Cynomys gunnisoni</i>
Hoary bat	<i>Lasiurus cinereus</i>
Northern pocket gopher	<i>Thomomys talpoides agrestis</i>
Plains pocket mouse	<i>Perognathus flavescens</i>
River otter	<i>Lontra canadensis</i>
Rocky mountain bighorn sheep	<i>Ovis canadensis canadensis</i>
Townsend's big-eared bat	<i>Corynorhinus townsendii townsendii</i>

3. Designating SCC is a two-step process... Under the cited example, it is stated that “A final go-through by RO and Forest staff found that one species (Rocky Mountain Bighorn Sheep) had been inadvertently missed on the list.” Steps 4,5,6,7 further direct how SCC lists will be determined, including language (page 6) for 2012 Rule Forests clearly stating that “**Your SCC list does not become final until you have a final approval revised plan at the end of your revision process.**” [emphasis added]

On page 7 of this August 8, 2016 direction, BHS are clearly included as a SCC for the RGNF:

Furthermore, in the species-specific detailed assessment, the status, overview, and management challenges for BHS are clearly specified, including mention of a 2010 extensive conservation assessment for BHS regarding the ecological conditions for recovery, conservation, and viability. It should be noted that despite repeated attempts to search the RGNF FPR website, WSF was unable to locate/access this 2010 BHS-specific conservation assessment. If WSF (and others, presumably) missed some obvious posting of this 2010 document, please advise a URL weblink where this document may be accessed. Of significance is the first bullet point under item 6, which notes a key ecological condition for recovery, conservation, and BHS viability on the RGNF is effective separation from domestic sheep and goats (see below).

6. Overview of ecological conditions for recovery, conservation, and viability [12.53 7, 9?, 10, 11, 12]:

An extensive conservation assessment for bighorn sheep was completed recently for the Rio Grande National Forest with details available regarding the ecological conditions for recovery, conservation, and viability (USDA Forest Service 2010).

Local habitat relationships and ecological needs for bighorn sheep are similar to that described elsewhere for Colorado. Most local bighorn sheep populations occur in steep, mountainous terrain in the alpine and subalpine zones. Most herds display elevational migrations which vary by season although some herds remain in the alpine zone throughout the year. There is ample unoccupied habitat for herd expansion on the Forest, but most herds experience limited growth due to past disease events. Information from the local bighorn sheep conservation assessment

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indicates that the key ecological conditions for recovery, conservation, and viability of bighorn sheep herds on the Forest includes:

- Effective separation from domestic sheep and, in the Sangre de Cristo Range, the potential inclusion of recreational pack goats. Effective separation is defined by science-based estimates of bighorn sheep core herd range and movements across the landscape in relationship to domestic sheep areas, and managing potential contact rates to an acceptable level ensure a minimal risk of disease transmission.
- Re-establishment of a meta-population structure where genetic interchange can occur between herds at a landscape scale, including adjacent Forest Service and BLM units.
- Within individual home ranges, habitat components that meet the foraging, resting, mating, lambing, thermal cover, and predator avoidance requirements.
- Ecological processes, such as wildfire, that help maintain adequate forage resources in the core herd home range, particularly in close proximity (~ 500 meters) of escape terrain.
- Adequate seclusion on important lambing and winter range areas. Management of human disturbances spatially and temporally near these key ecological condition areas.

Nowhere in the intervening time between the August 2016 RO direction and the September 2017 draft Forest Plan was WSF (and presumably others) aware of rationale or correspondence documenting why BHS were excluded from the SCC list in the draft Forest Plan. Public involvement and documenting rationale for including or excluding SCC species is required under the 2012 Rule. WSF and other individuals/organizations interested in BHS on the RGNF should be provided access to the USFS rationale explaining why BHS have been excluded as an SCC species. Clearly, again consistent with Acting Regional Forester Jacque Buchanan's August 2016 RO direction, WSF recommends that BHS be added to, and appropriately analyzed as, an SCC species for the RGNF. WSF is well aware of language that says "***...the potential list of SCC will not be finalized for 2012 Rule Revision Forests until the Record of Decision (ROD) is signed for the revised plan at the end of the revision process.***" It is not too late to include BHS as an SCC species. Furthermore, designation as an SCC species will require a viability assessment to be completed by the USFS RGNF; WSF (and others) views this as an essential step to ensure persistence of BHS on the RGNF, through time.

On page 2 of the draft Forest Plan, Standards are defined as "*...strict, mandatory constraints on projects and activities and do not allow for variation. Standards are written in a precise manner using mandatory or prohibitive wording. They are designed to help achieve or maintain desired conditions, mitigate undesirable effects, or meet other applicable requirements.*" [italics added]

On page 26 of the draft Forest Plan, under Standards for Wildlife, S-WLDF-10 (page 27) states "*Maintain effective separation to minimize the risk of disease transmission between domestic sheep and bighorn sheep on active grazing allotments. Effective separation is defined as spatial or temporal separation between bighorn sheep and domestic sheep, resulting in minimal risk of contact and subsequent transmission of respiratory pathogens between animal groups (Forestwide).*" [italics added] Standards S-WLDF-11, -13, and -14 (page 28) also speak to the need to maintain effective separation between domestic sheep and BHS. In our experience, forest plan standards (and guidelines) can be ignored or interpreted to get around the strict, mandatory, prohibitive wording that standards are designed to insure. Again, a viability assessment is critical to long-term persistence of BHS on the RGNF. Page 92 of the draft FP, under Chapter 4. Monitoring, states, that "*...at a minimum, the FP monitoring program must contain one or more monitoring questions and associated indicators that address the following eight items: (iv) – The status of a select set of the ecological conditions required under S 219.9 to ...maintain a viable population of each species of conservation concern.*" [italics added] It is quite clear to WSF (and others) that BHS are being excluded as an SCC species, to avoid a requisite viability assessment.

Additional deficiencies found in the RGNF Draft EIS and Draft Forest Plan:

1. The Range Suitability analysis was done in 2003; BHS were added to the USFS R2 Sensitive Species list in 2007. The Range Suitability analysis was not updated to address that change in status, and the increased level of management responsibility to not trend toward listing. The Range Suitability analysis addresses the appropriateness of grazing, based on environmental consequences. Other uses and values are to be considered to identify areas not appropriate for grazing. The RGNF is remiss in not updating the Range Suitability analysis to address BHS as a Regional Forester-designated Sensitive Species and further, has not addressed suitability for the current RGNF FPR; this analysis is obsolete and insufficient. The 2012 Planning Rule does not require a suitability analysis for range, however, FSM/FSH 1909.12_10 13.32 requires the Interdisciplinary Team to identify and evaluate available information about range such as the impacts of grazing on ecological integrity and species diversity. The RGNF did not analyze the impacts of domestic sheep grazing on ecological integrity, as it applies to BHS.
2. Inadequate Cumulative Effects section: there is no discussion of cumulative effects of adjacent federal, state and private-land domestic sheep grazing operations that will impact BHS on the RGNF. Long-term persistence on the RGNF cannot be evaluated without recognition and analysis of domestic sheep grazing

on adjacent lands. Although not mentioned in the Cumulative Effects section, an example is found on Page 239: “All action alternatives include management direction to help minimize or prevent the risk of potential contact between BHS and domestic sheep, and help address the separation objectives when the two species occur in proximity”. Currently, many but not all of the existing BHS herds have been assessed for potential movements within and beyond their Core Herd Home Range (CHHR) in relationship to domestic sheep grazing allotments and other BHS herds, including movements on to adjacent administrative units and state and private lands. Individual BHS on the RGNF have demonstrated straight-line movements of more than 20 miles, including movements to and from the San Juan NF and the GMUG NFs. Although acknowledged, there is again no analysis of risk outside the RGNF boundary that affects persistence on the RGNF.

3. Between iterations of RGNF plan revision documents, Management Area prescription 5.42 for BHS was collapsed into 5.41 general big game winter range; MA 5.41 is insufficient to address summer domestic sheep grazing, as BHS winter range/lambing range protection, though important, isn’t the most pressing issue affecting BHS. The conflict is clear, and there needs to be identified BHS management areas to ensure BHS herd viability.
4. The RGNF FPR has guidance for Desired Conditions (DC), Standards (S), Management Approaches (MA) and Management Areas (MA). It is important to note that MAs have no regulatory basis or requirement (not in the NEPA realm), so the USFS cannot be held accountable for any of these vague promises.
 - a. Page 25: DC-4: Habitat alone will not meet the needs of BHS, as the presence of domestic sheep impacts ecological conditions, impeding long-term BHS persistence. The primary issue is on summer range where contact with domestic sheep may occur. Although protecting winter range is important, it doesn’t address the most significant and immediate problem.
 - b. DC-13: Restore/improve habitat quality on BHS range to decrease potential for disease transmission. There is no explanation of how the USFS RGNF proposes to do this. Home range overlap, foraging BHS and stray domestic sheep do not happen as a result of habitat quality issues; rather, it is the attraction of being on the same range at the same time, or in close proximity, that is the central issue.
 - c. S-WLDF-10: What is “minimal risk of contact”? How is it measured? Who determines acceptable risk of contact? This Standard is not defined or measureable, and is therefore unenforceable. In the draft FP (page 100), under Table 14, “Forest Plan-Level Monitoring Questions and Indicators of Measure for Goal 2”, an appropriate monitoring question (MQ6a) could be: How effective are measures to maintain effective spatial and temporal separation between domestic sheep and BHS, while minimizing risk of disease transmission (per Standard S-WLDF-10)? Indicators, Data Source(s), and Adaptive Management Questions could and should be identified as to how the USFS RGNF will monitor/evaluate effective separation.
 - d. S-WLDF-11: Mitigate adverse impacts? How? “Prevent” or “preclude” is a standard that can be defined and enforced.
 - e. MA WLDF 10: Increase awareness of recreational pack goats. Increasing awareness does not mitigate potential contact and potential pathogen transfer. Similar to the Shoshone NF in Wyoming, also in USFS R2, what about prohibition of recreational pack goats in sensitive BHS habitats? Or, health testing of pack goats prior to use, that requires an advance USFS permit?
 - f. MA WLDF 11: Assessing BHS populations and evaluating effectiveness of management are good things, however, they do not address the known risk of contact!
 - g. MA WLDF 12: Develop a separation response plan for allotments determined to have a high or moderate risk of contact. There should be no domestic sheep grazing on high or moderate risk-of-contact allotments. Response plans may be more appropriate for low-risk areas that continue to have domestic sheep grazing. For example, on the Snow Mesa/Wishbone allotment, how did the separation response work for 50+ stray domestic sheep in 2017? Response usually results in BHS removal; this is not appropriate management. The attractant is the issue that must be addressed. The best scientific information available recognizes that BMPs do not work, and court challenges have upheld that conclusion. There are no USFS funds available or earmarked for monitoring, so that

doesn't occur, or if done, the agency response is usually delayed enough that it is difficult to find offending or stray animals, whether domestic sheep or BHS.

- h. MA WLDF 14: Similar to what has been enacted on the Shoshone NF in Wyoming, prohibit recreational pack goats in sensitive BHS areas, not just observe and report it in overlap areas!
- i. MA 5.41: Grazing is supposed to be managed to provide effective separation and minimize risk of contact. How does general big game winter range management provide effective separation during summer grazing seasons? What is considered effective, and what is sufficient in terms of minimizing risk-of-contact?
- j. Table 22 clearly points out the existing BHS situation with some errors. Pre-European settlement BHS estimates are 1.5-2 million, not .5 million, and BHS habitat isn't naturally fragmented and in fact, particularly in Colorado, is quite connected and in some places, is continuous. This table indicates one BHS herd, the Sangre de Cristo, is likely to persist; that is not sufficient for viability.

Bottom line, the Wild Sheep Foundation strongly recommends modification of the SCC list for the RGNF FPR to include BHS, as clearly allowed and articulated by USFS R2 RO August 2016 direction. **The SCC list is NOT finalized for 2012 Rule Revision Forests (including the RGNF) until the Record of Decision (ROD) is signed for the revised plan at the end of the revision process.** [emphasis added] Completion of a viability assessment for BHS on the RGNF is essential to effectively conserve and manage BHS on the RGNF.

WSF appreciates the opportunity to comment on the draft RGNF Forest Plan, and we look forward to hearing back from the USFS RGNF on our specific comments. WSF intends to remain engaged, as the RGNF plan revision continues.

Sincerely,



Gray N. Thornton
President & CEO



Kevin Hurley

Kevin Hurley
Senior Conservation Director

cc: Brett K. Jefferson, WSF Chairman
Jack Atcheson, Jr., WSF Conservation Committee Chairman
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